

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

**RECEIVED**

SEP 18 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Implementation of the Pay  
Telephone Reclassification  
and Compensation Provisions of the  
Telecommunications Act of 1996

)  
)  
)  
)  
)  
)

CC Docket No. 96-128

**DOCKET FILE COPY ORIGINAL**

---

**REMAND REPLY COMMENTS OF THE  
ILLINOIS PUBLIC TELECOMMUNICATIONS ASSOCIATION**

Michael W. Ward  
John F. Ward, Jr.  
Henry T. Kelly  
O'Keefe, Ashenden Lyons & Ward  
30 North LaSalle, Suite 4100  
Chicago, IL 60602  
312-621-0400  
Fax: (312) 621-0400

*Counsel for the Illinois Public Telecommunications  
Association*

Dated: September 9, 1997

---

No. of Copies rec'd \_\_\_\_\_  
List ABCDE \_\_\_\_\_

*J*

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Implementation of the Pay	)	CC Docket No. 96-128
Telephone Reclassification	)	
and Compensation Provisions of the	)	
Telecommunications Act of 1996	)	

---

**REMAND REPLY COMMENTS OF THE  
ILLINOIS PUBLIC TELECOMMUNICATIONS ASSOCIATION**

The Illinois Public Telecommunications Association ("IPTA") submits the following Reply Comments to the comments filed August 26, 1997, in response to the Federal Communications Commission's ("FCC") Notice for Comment on Remand Issues in the Payphone Proceeding.

**I. INTRODUCTION.**

The United States Court of Appeals remanded the FCC's determination, setting the rate on compensation for access code and subscriber 800 calls on payphones at the market rate for deregulated local coin calls, on the basis that the FCC failed to explain or justify its conclusion. *Illinois Public Telecommunications Association v. Federal Communications Commission*, \_\_ F.3d \_\_ (D.C.Cir. 1997). The Court referred to numerous comments by interexchange carriers ("IXCs") that the price of local coin calls is an inappropriate compensation surrogate because the cost of coin calls is higher than coinless calls, such as access code and subscriber 800, due to the

additional expense of coin equipment and coin collection. The Court also alluded to IXC comments that local coin call costs are higher because they include the cost for originating and completing local calls while coinless calls only bear the cost of originating calls. Because of the *Payphone Orders*'<sup>1</sup> failure to explain their rejection of the points raised by the IXCs, the matter was remanded to the FCC for further consideration.

The FCC's Notice seeks comments on: (1) the differences in costs to the payphone service provider ("PSP") of originating subscriber 800 calls and access code calls versus local coin calls; (2) how these cost differences should affect market base compensation amounts; and (3) whether the local coin rates, subject to an offset for expenses unique to those calls, is an appropriate per call compensation rate for calls not compensated pursuant to contract or other arrangement.

The IPTA notes that the Appellate Court did not disagree with the FCC's determination, but, rather, indicated that the FCC's *Payphone Orders* did not provide an analysis or response to these points raised by the IXCs. Without any such explanation in the *Payphone Orders*, the Court found that it had no basis for sustaining the conclusion. In the Remand proceedings, the Court calls upon the FCC to explain and respond to the points raised by the IXCs. Numerous comments have been filed in response to the FCC's Notice. The IPTA submits that the evidence before the FCC is extensive in establishing and supporting that a per call compensation level of \$0.35 is a minimal level of justifiable compensation.

## **II. THE FCC MUST NOT ALLOW ITSELF TO BE CONFUSED BY CARRIERS WHICH SEEK TO MIX COST ANALYSIS WITH MARKET ANALYSIS.**

---

<sup>1</sup> *In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket Nos. 96-128, 91-35, Released September 20, 1996 ("Payphone Compensation Order"); *Order on Reconsideration*, Released November 8, 1996 (*Reconsideration Order*) (Combined "Payphone Orders").

The IPTA respectfully submits that the FCC has before it a very extensive record upon which to base its determination. However, some parties have sought to obfuscate the issues through their mixing of apples and oranges as a substitute for substantive positions. Therefore, it is essential that if the FCC is to proceed forward, it must start with the basics and maintain clarity in what is being analyzed. In the absence of any established charge for access code calls and 800 subscriber service calls from payphone facilities, two forms of analysis have been undertaken to determine an appropriate basis for setting a compensatory rate: 1) the underlying cost of the payphone facilities averaged across the amount of traffic on that payphone facility to determine an average incremental cost per call which must be recovered; and 2) market comparisons of the value of utilization of payphone facilities. Although some parties have sought to intertwine these distinct approaches, the FCC must be vigilant in insisting that analyses remain consistent with the purport approach being applied.

The FCC's *Payphone Orders* concluded that the market would best set the appropriate price for payphone calls in the long term, and established the deregulated local coin call rate as a market based determination of fair compensation. *Payphone Compensation Order* at par. 70. It must be remembered that the deregulated local coin call rate is the price of a call, not its cost. Costs are recovered by a carrier or company on the basis of the totality of its revenues, which are determined by the totality of its traffic volumes and prices. The price for local coin traffic is the lowest price of all the prices, coin and noncoin, set for calls through payphone facilities. The telecommunications marketplace has traditionally associated higher rates with longer distance calls. However, on the cost basis, as opposed to the price basis, the costs of longer distance calls do not increase as rapidly as the price. This allows for higher margins on calls of longer distance. When seeking to recover costs, particularly fixed costs in setting market prices, a carrier often recovers more of its fixed costs through its higher margin offering, seeking to use those margins to subsidize any costs not recovered in the lower priced calls.

When the Illinois Commerce Commission determined that Illinois Bell Telephone Company/Ameritech Illinois' competitive payphone services needed to raise its coin rates \$10.5 million to recover its costs, Ameritech adjusted its coin rates across the entire spectrum of coin calls. (See IPTA Comments filed July 1, 1996, Appendix A - *Independent Coin Payphone Association v. Illinois Bell Telephone*, ICC Docket No. 88-0412, Order, June 7, 1995, pp. 20-21.) Ameritech did not have higher fixed costs for longer distance calls. A payphone's fixed costs are unaffected by the distance of a call. But the costs were recovered throughout the various coin rates, not just through increasing the initial local coin charge to \$0.35. The local coin rate itself did not recover these costs but was assisted by a disproportionate recovery from the higher priced calls. If costs are recovered at all, they are recovered through the gross revenues, or average revenue per call, not through the initial charge for the lowest priced call.

Although local coin calls also traditionally have the largest call volumes, the inclusion of other coin traffic, even with substantially lower volumes, can only result in increasing the average coin rate per call from a payphone station. The local coin rate by itself does not identify for the Commission the average cost per call of the payphone station. The Commission has already noted that many jurisdictions with regulated coin rates often subsidize local coin rates. *Payphone Compensation Order* at par. 68. The Commission selected a deregulated market on the assumption that, freed of regulation, a carrier would seek to recover its cost in setting its prices. However, markets also seek to avoid sudden rate shocks and are subject to the market expectations of its consumers. A payphone provider in a deregulated market would seek to recover all of its costs through the sum total of all of its revenues.

Fixed costs, by definition, do not vary and would maintain a constant average fixed cost per call. In seeking to deduce the probable fixed cost per call by looking at pricing, the analysis

would first have to look at the weighted *average price* per call. Although local coin calls would generally constitute the largest volume of coin traffic, all other coin traffic would be at rates higher than local and, despite lesser volumes, can only result in an increasing the average coin rate per call from which fixed costs are recovered. If one adds to this analysis the nonsent paid calls, those prices generally exceed local coin rates thus further increasing the weighted average price per call upon which fixed costs are recovered. As the Commission can see from this analysis, seeking to determine *costs* by looking at *prices* involves numerous factors.

The IPTA cautions the Commission of the traps laid by some parties seeking other than a factual determination of sound policy. When discussing costs, a party should focus its attention on the costs. When discussing market based rates, the party should focus on market based comparables. But when seeking to extrapolate or analyze a cost when reviewing a rate, or to analyze a rate when reviewing a cost, the numerous factors which go into this cost analysis must be included. The Commission has before it in the record extensive cost data to analyze the cost of the payphone services. Separately, the Commission has numerous market rates presented for analysis of the market's determination of the value of payphone services. Through the analysis of this data of record, the questions posed by the Commission can be addressed.

### **III. THE RECORD SUPPORTS A PER CALL COMPENSATION LEVEL OF NO LESS THAN \$0.35 PER CALL.**

A number of parties have submitted arguments regarding cost data in this proceeding. Although, the FCC elected to rely upon the deregulated market rate for a local coin call, the cost information must again be reviewed in light of the IXCs' arguments addressing underlying costs. The FCC referred to the costs submitted in the initial proceeding as surrogate data, although in total it constituted the overwhelming majority of the payphones in issue. *Payphone Compensation Order* at par. 67. In that round of proceedings, the RBOC Payphone Coalition

submitted a cost analysis of six of the seven Regional Bell Operating Companies ("RBOCs"). Peoples Telephone Company, Inc. ("Peoples") one of the largest independent payphone providers ("IPPs") submitted its own embedded cost analysis. MCI submitted a report from Hatfield Associates extrapolating its own conclusions from selected data found in a Southern New England Telephone ("SNET") cost study of incremental payphone costs in New Hampshire. The IPTA submitted a cost analysis from a proceeding before the Illinois Commerce Commission investigating the setting of a payphone compensation rate for access code and subscriber 800 calls. The FCC noted that these studies included variances in approaches and conclusions. However, a review of the data also reflects some consistencies and addresses some of the cost questions promoted by the IXCs, which analysis has been required by the Appellate Court.

In the Remand comments, a number of parties submitted additional cost information. RBOC/GT/SNET Payphone Coalition Remand at 15-20; American Public Communications Counsel ("APCC") Remand at 11-16; People's Remand at 8-15; Communications Central Inc. ("CCI") Remand at 6-10; Teleleasing Enterprises, Inc. Remand at 4-10; AT&T Remand at 10-13. MCI relies upon the Hatfield Report submitted in its July 1, 1996 Comments. MCI Remand at 3. The IPTA already submitted its cost analysis in its July 1, 1996 Comments.<sup>2</sup> Except for AT&T and MCI, this cost data shows fixed non-traffic sensitive costs averaged over the number of calls to the payphone facility ranging from a low of \$0.2953 per call to a high of \$0.55 per call. These studies exclude the usage costs referred to by the Appellate Court. The MCI and AT&T cost submissions purport that the fixed non-traffic sensitive costs, averaged over the number of calls to the payphone, result in an average fixed cost of \$0.083 (MCI) to \$0.11 (AT&T) per call. As the Commission has already recognized in the *Payphone Compensation Order*, the variety of inputs,

---

<sup>2</sup> A number of carriers have made reference to a statement made by SNET before the Massachusetts Department of Public Utilities that the cost of a local coin call is \$0.167 per call. In contrast to the above cost analysis, this unexplained statement provides no breakdown, support, or analysis.

arguments, and analyses involved in ascertaining the appropriate and relevant costs make a cost-based analysis difficult to reconcile and regulate.

For example, as identified by the RBOC/GT/SNET Payphone Coalition, MCI's Hatfield analysis selectively picked a single low cost for indoor coinless payphone stations without even identifying and describing to the FCC the other payphone station costs in the study. The SNET New Hampshire payphone study actually included six different payphone station costs for semi-public and public payphones. Hatfield selected only the coinless station costs for indoor payphones of \$300.39, on the theory that coinless payphones were a better cost surrogate than coin payphones for access code and 800 subscriber calls. What Hatfield did not inform the FCC is that it totally ignored the station cost for coinless outdoor payphones of \$1,289.19 per station. As identified in the RBOC/GT/SNET Payphone Coalition Remand Comments, Arthur Andersen Report at 8, the difference between coinless indoor (\$300.39) and coin indoor (\$335.76) and of coinless outdoor (\$1,289.19) and coin outdoor (\$1,324.56) is not nearly as significant as the difference between coinless indoor (\$300.39) and coinless outdoor (\$1,289.19). Although Hatfield purportedly was utilizing coinless as the appropriate surrogate, it totally failed to include in its analysis, or identify to the FCC, that it had unilaterally eliminated the more expensive *coinless* station. Without a candid identification of costs to the FCC, the FCC can not hope to determine any reasoned cost basis which would accurately reflect the underlying cost of payphone facilities.

Beyond the issue of the candor and accuracy used in determining the pool of fixed payphone costs, the FCC must then average recovery of those costs across the calling traffic utilizing that payphone station. Without belaboring the arguments already made before the FCC regarding the cost inputs utilized by the companies, a review of this second step alone reflects that the cost analyses are not as disparate as they would appear. Both AT&T and MCI analyses argue



that the appropriate fixed pool of costs are most appropriately reflected by the cost of a coinless payphone station. As is typical in telecommunications, most cost are lumpy, fixed costs. These costs do not vary whether a payphone station processes one or five-hundred calls. Since recovery of those costs from the first call alone is impractical, these costs are theoretically averaged over all of the traffic from that payphone station to uniformly recover those costs over a period of time.

*Without* the above adjustments to Hatfield's fixed costs analysis, Hatfield claims that the coinless payphone station costs \$422.63 per year. MCI Comments of July 1, 1996, Hatfield at 3. AT&T provides an analysis for a coinless payphone station at \$922.20 per year (\$76.85 per month). AT&T Remand Comments at 11. According to both MCI and AT&T, these are the fixed costs of an existing coinless payphone station. Although these costs must be recovered from all of the traffic through that payphone station, both AT&T and MCI presume that a coinless payphone station will recover the specific fixed costs of that coinless station from coin traffic. Coin traffic can only be generated from a coin instrument payphone station which has a different fixed cost basis. In the over twelve years of the history of the IPTA, there is not been one known incident of a coin call having been placed over a coinless payphone station. When an independent payphone provider incurs fixed costs to establish a coinless payphone station, those fixed costs are recovered from the coinless traffic through that phone. To increase that traffic by the addition of coin traffic, additional fixed investments must be made by the payphone provider to include all of the fixed costs necessary for processing coin traffic. Although this additional investment may be logical to reach the additional traffic, it is still impossible to reach that additional traffic without incurring these additional fixed costs for the coin instrumentality. Both MCI and AT&T, in purportedly determining the fixed costs of a coinless station, failed to appropriately utilize the coinless traffic through that station in determining an average fixed cost per coinless call.

To determine how a payphone provider recovers the fixed costs of a coinless payphone station, those fixed costs must be averaged over the coinless traffic through that payphone station. In addressing the Hatfield analysis' annual fixed cost of \$422.63 per coinless station per year, the SNET New Hampshire study would reflect that there are somewhat less than 9,747,286 non-coin calls per year.<sup>3</sup> Dividing the 9,747,286 non-local coin calls by the 7,913 payphone stations, this averages 1,232 calls per station. Dividing Hatfield's station costs of \$422.63 by the 1,232 calls this averages a fixed cost of \$0.343 per call.

AT&T utilizes the same apples and oranges comparison in its cost arguments submitted in the Remand comments. After eliminating any costs, or ability, for the payphone station to handle coin traffic, AT&T concludes that there are station costs of \$76.85 per month for an existing coinless station. AT&T then purports to attempt to recover this fixed coinless station cost from the coin traffic, which must occur on a different payphone station and which requires the inclusion of fixed coin equipment investment. AT&T relies upon the traffic information in the APCC Comments, filed July 1, 1996, at page 5, to average its coinless payphone station costs over an average of 700 calls per station per month, which primarily constitutes coin traffic. AT&T Remand Comments at 11; AT&T Remand Comments, David Robinson Affidavit at 12. However, the APCC comments indicate that of the approximate 700 calls per month, 500 constitute coin traffic and 200 non-coin traffic. Since the only traffic on the coinless payphone station identified by AT&T would be the non-coin traffic, the fixed cost of that station must be recovered over the 200 coinless calls from that station.<sup>4</sup> Applying the APCC traffic figures of 200 coinless calls per station per month to AT&T's determination of fixed coinless costs, the average incremental cost

---

<sup>3</sup> This takes Hatfield's total calls of 40,407,545 less the 30,660,259 local coin calls identified in the SNET study, p. 87. Presumably, the remaining number includes non-local coin traffic as well.

<sup>4</sup> The estimate of 700 calls per month traffic, with approximately 200 such coins being coinless, is confirmed by the additional data submitted by People's Remand Comments at 6 (168 of 723 calls are coinless) and CCI's Remand Comments at 8 (183 of 720 calls per month are coinless).

per call would be \$0.384 per call. Utilizing the traffic figures of CCI, this would amount to a fixed cost of \$0.42 per call. The traffic figures of People's would reflect an average fixed cost figure of \$0.457 per call.


As should be clear from the above, there are numerous methods of addressing cost analysis. Even with reasonable efforts, cost analysis at best is subject to considerable variations in results. However, the IPTA submits that even despite some of the obvious errors in the MCI and AT&T analysis, which will be addressed more thoroughly by other parties, simply correcting the applicable traffic figures for a coinless payphone station to the coinless traffic it handles identifies that the range of average fixed costs per call is no where near as expansive as interexchange carriers would purport the FCC to believe. Even MCI's Hatfield's less than credible fixed station costs per year shows an average incremental cost per coinless call of \$0.343. AT&T's fixed coinless station costs would average between \$0.384 and \$0.457 per coinless call. These do not substantially differ from the fixed cost per coinless calls submitted by the more accurate and detailed data of the payphone providers.

#### IV. CONCLUSION.

The Illinois Public Telecommunications Association respectfully submits that the local coin rate of \$0.35 per call is a market based compensation at the lowest market rate by which payphone services are available. The market rate for utilizing payphone services, including operator assistance services such as those promoted by the interexchange carriers in their access code operator traffic, ranges from \$0.35 per call to rates in excess of \$2.00 per call. Compensation below the lowest market rate available for use of the payphone services would be arbitrary and capricious, as recognized by both the cost data and the market data submitted of record.

Respectfully submitted,

Illinois Public Telecommunications Association

A handwritten signature in cursive script that reads "Michael W. Ward". The signature is written in dark ink and is positioned above a horizontal line.

Michael W. Ward  
One of Its Attorneys

Michael W. Ward  
John F. Ward, Jr.  
Henry T. Kelly  
O'Keefe, Ashenden Lyons & Ward  
30 North LaSalle, Suite 4100  
Chicago, IL 60602  
312-621-0400

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of September, 1997, I caused copies of the foregoing Comments of the Illinois Public Telecommunications Association to be served upon the parties on the attached service list by first class mail.

A handwritten signature in cursive script, reading "Alberta Seiler". The signature is written in dark ink and is positioned above a horizontal line.

Alberta Seiler

ACTEL, Inc.  
P. O. Box 391  
Cedar Knolls, NJ 07927

Patricia A. Hahn  
Airports Council International-North America  
1775 K St., NW, Suite 500  
Washington, D.C. 20006

Charles H. Kennedy  
Morrison & Foerster  
2000 Pennsylvania Ave., NW  
Washington, D.C. 20006-1888  
Counsel for Airports Council  
International-North America

Derek Blake  
American Airlines Admirals Club  
P. O. Box 619616, MD 2645  
DFW Airport, TX 75261-9616

Charles M. Barclay  
American Association of Airport Executives  
4212 King Street  
Alexandria, VA 22302

Kevin Maher  
American Hotel & Motel Association  
1201 New York Ave., NW, Suite 600  
Washington, D.C. 20005-3917

Albert H. Kramer  
Robert F. Aldrich  
Dickstein, Shapiro, Morin & Oshinsky, L.L.P.  
2101 L Street, NW  
Washington, D.C. 20037-1526  
Attorneys for American Public  
Communications Council

Alan N. Baker  
Ameritech  
2000 West Ameritech Center Dr.  
Hoffman Estates, IL 60196

Paul J. Berman  
Alane C. Weixel  
Covington & Burling  
1201 Pennsylvania Ave., NW  
P.O. Box 7566  
Washington, D.C. 20044-7566  
Attorneys for Anchorage Telephone Utility

E. Ashton Johnston  
Paul, Hastings, Janofsky & Walker  
1299 Pennsylvania Ave., NW, 10th Floor  
Washington, D.C. 20004-2400  
Attorneys for Arch Communications  
Group, Inc.

John M. Goodman  
Edward D. Young, III  
Bell Atlantic  
1133 20th Street, NW  
Washington, D.C. 20036

M. Robert Sutherland  
Theodore R. Kingsley  
BellSouth Corporation  
1155 Peachtree St., NE, Suite 1700  
Atlanta, GA 30309-3610

Robert M. Brill, Esq.  
757 Third Ave., 12th Floor  
New York, NY 10017

Rachel J. Rothstein  
Cable & Wireless, Inc.  
8219 Leesburg Pike  
Vienna, VA 22182

Thomas J. MacBride, Jr.  
Kathryn A. Fugere  
Goodin, MacBride, Squeri,  
Schlotz & Ritchie, LLP  
505 Sansome St., Suite 900  
San Francisco, CA 94111  
Attorneys for the California Association  
of Long Distance Telephone Companies

Martin A. Mattes  
Graham & James  
One Maritime Plaza, Suite 300  
San Francisco, CA 94111  
Attorneys for California Payphone Assn.

Peter Arth, Jr.  
Edward W. O'Neill  
Patrick S. Berdge  
505 Van Ness Avenue  
San Francisco, CA 94102  
Attorneys for the People of the State  
of California and the Public Utilities  
Commission of the State of California

Glenn Stehle  
Call West Communications, Inc.  
701 N. St. Mary's  
San Antonio, TX 78205

James A. Thelen  
The Cleveland Clinic Foundation  
9500 Euclid Avenue  
Cleveland, OH 14195

C. Douglas McKeever  
Communications Central Inc.  
1150 Northmeadow Parkway, Suite 188  
Roswell, GA 30076

Genevieve Morelli  
Competitive Telecommunications Assn.  
1140 Connecticut Ave., NW, Suite 220  
Washington, D.C. 20036

Danny E. Adams  
Steven A. Augustino  
Kelly Drye & Warren LLP  
1200 Nineteenth St., NW, Suite 500  
Washington, D.C. 20036  
Attorneys for Competitive  
Telecommunications Association

Kevin E. Cox  
Dallas/Fort Worth International Airport  
3200 East Airfield Drive  
Post Office Drawer 619428  
DFW Airport, TX 75261-9428

J. Christopher Dance  
Kerry Tassopoulos  
Excel Telecommunications, Inc.  
8750 North Central Expressway, 20th Floor

Dallas, TX 75231  
Thomas K. Crowe, Esq.  
2300 M St., NW, Suite 800  
Washington, D.C. 20037  
Counsel for Excel Telecommunications, Inc.

Cynthia B. Miller  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Angela B. Green  
Florida Public Telecommunications  
Association, Inc.  
125 S. Gadsden St., Suite 200  
Tallahassee, FL 32301

Joseph Kelley  
Flying J Inc.  
P. O. Box 678  
Brigham City, UT 84302-0678

Roy L. Morris  
Frontier Corporation  
1990 M St., NW, Suite 500  
Washington, D.C. 20036

Michael Shortley  
Frontier Corporation  
180 South Clinton Avenue  
Rochester, NY 14646

Newton M. Galloway  
113 Concord Street  
Zebulon, GA 30295  
Attorney for Georgia Public  
Communications Association

Albert H. Kramer  
Robert F. Aldrich  
Dickstein, Shapiro, Morin & Oshinsky, L.L.P.  
2101 L St., NW  
Washington, D.C. 20037-1526  
Special Attorneys for Georgia Public  
Communications Association

Robert C. Caprye  
GVNW, Inc./Management  
7125 S.W. Hampton Street  
Portland, OR 97223

Ralph Nelson  
Marsha H. Smith  
Dennis S. Hansen  
Idaho Public Utilities Commission  
472 West Washington Street  
P. O. Box 83720  
Boise, ID 83720-0074

Hank Smith  
Independent Technologies, Inc.  
11422 Miracle Hills Drive  
Omaha, NE 68154

Robert C. Glazier  
Indiana Utility Regulatory Commission  
Indiana Government Center South  
302 West Washington, Suite E306  
Indianapolis, IN 46204

Albert H. Kramer  
Robert F. Aldrich  
Jacob S. Farber  
Dickstein Shapiro Morin & Oshinsky L.L.P.,  
2101 L Street, NW  
Washington, D.C. 20037-1526  
Attorneys for Inmate Calling Services  
Providers Coalition

Judith St. Ledger-Roty  
Enrico C. Soriano  
Wendy I. Kirchick  
Reed Smith Shaw & McClay  
Suite 1100 - East Tower  
1301 K Street, NW  
Washington, D.C. 20005-3317  
Attorneys for The Intelicall Companies

C. Douglas McKeever  
InVision Telecom, Inc.  
1150 Northmeadow Parkway, Suite 118  
Roswell, GA 30076

William H. Smith, Jr.  
Sandra Makeeff  
Iowa Utilities Board  
Lucas State Office Bldg.  
Des Moines, IA 50319

Bryan Peterson  
Kampgrounds of America, Inc.  
P. O. Box 30558  
Billings, MT 59114

Robert E. Cohn  
Alexander Van der Bellen  
Shaw, Pittman, Potts & Trowbridge  
2300 N Street, NW  
Washington, DC 20037  
Attorneys for the City of  
Kansas City, Missouri

Catherine R. Sloan  
Richard C. Fruchterman  
Richard S. Whitt  
LDDS WorldCom  
1120 Connecticut Ave., NW, Suite 400  
Washington, D.C. 20036

Douglas F. Brent  
LDDS WorldCom  
9300 Shelbyville Road, Suite 700  
Louisville, KY 40222

Joel B. Shifman  
Maine Public Utilities Commission  
242 State St. House Station No. 18  
Augusta, ME 04333-0018

Mary J. Sisak  
Donald J. Elardo  
MCI Telecommunications Corp.  
1801 Pennsylvania Ave., NW  
Washington, D.C. 20006

William R. Ralls  
Leland R. Rosier  
Butzel Long  
118 West Ottawa St.  
Lansing, MI 48933  
Attorneys for Michigan Pay  
Telephone Association

Willard C. Reine  
314 East High Street  
Jefferson City, MO 65101  
Counsel for the Midwest Independent  
Coin Payphone Association

National Association of RV Parks  
and Campgrounds  
8605 Westwood Center Dr., Suite 201  
Vienna, VA 22182-2231



Richard A. Askoff  
Donna A. DiMartino  
National Exchange Carrier Association, Inc.  
100 South Jefferson Road  
Whippany, NJ 07981

David Cosson  
Pamela Sower Fusting  
National Telephone Cooperative Assn.  
2626 Pennsylvania Ave., NW  
Washington, D.C. 20037

W. Dewey Clower  
NATSO, Inc.  
1199 North Fairfax St., Suite 801  
P.O. Box 1285  
Alexandria, VA 22313-1285

E. Barclay Jackson  
New Hampshire Public Utilities Commission  
8 Old Suncook Road  
Concord, NH 03301-7310

Blossom A. Peretz  
New Jersey Division of the  
Ratepayer Advocate  
31 Clinton St., 11th Floor  
Newark, NJ 07101

New Jersey Payphone Association  
108 Main Street  
Oceanport, NJ 07757-1030

David Kaufman  
New Mexico State Corporation Commission  
Post Office Drawer 1269  
Santa Fe, NM 87504-1269

Martin Cintron  
Salvadore Uy  
Gary S. Lutzker  
Harley J. Goldstein  
New York City Department of Information  
Technology and Telecommunications  
11 Metrotech Center, 3rd Floor  
Brooklyn, NY 11201

Maureen O. Helmer  
Mary Burgess  
Penny Rubin  
New York State Dept. of Public Service  
Three Empire State Plaza  
Albany, NY 12223

Ann E. Henkiner  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215-3793

Ernest G. Johnson  
Cece Wood  
Maribeth D. Snapp  
Oklahoma Corporation Commission  
P. O. Box 25000-2000  
Oklahoma City, OK 73152-2000

Mitchell F. Brecher  
Fleischman and Walsh, L.L.P.  
1400 Sixteenth St., NW  
Washington, D.C. 20036  
Attorneys for Oncor Communications, Inc.

Judith St. Ledger-Roty  
Enrico C. Soriano  
Wendy I. Kirchick  
Reed Smith Shaw & McClay  
Suite 1100-East Tower  
1301 K Street, NW  
Washington, D.C. 20005-3317  
Attorneys for Paging Network, Inc.

Terrence J Buda  
Veronica A. Smith  
John F. Povilaitis  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265

Bruce W. Renard  
Peoples Telephone Company, Inc.  
2300 NW 89th Place  
Miami, FL 33172

Eric L. Bernthal  
Michael S. Wroblewski  
Latham & Watkins  
1001 Pennsylvania Ave., NW, Suite 1300  
Washington, D.C. 20004  
Attorneys for Peoples Telephone  
Company, Inc.

Mark J. Golden  
Personal Communications  
Industry Association  
500 Montgomery St., Suite 700  
Alexandria, VA 22314-1561

Katherine M. Holden  
Stephen J. Rosen  
Wiley, Rein & Fielding  
1776 K St., NW  
Washington, D.C. 20006  
Attorneys for Personal Communications  
Industry Association

Joe D. Edge  
Sue W. Bladek  
Drinker, Biddle & Reath  
901 Fifteenth St., NW  
Washington, D.C. 20005  
Attorneys for Puerto Rico  
Telephone Company

Michael K. Kellogg  
Jeffrey A. Lamken  
Kevin J. Cameron  
Kellogg, Huber, Hansen, Todd & Evans  
1301 K St., NW, Suite 1000 West  
Washington, D.C. 20005  
Counsel for the RBOC Payphone Coalition

Susan Drombetta  
Scherers Communications Group, Inc.  
575 Scherers Court  
Worthington, OH 43085

Reginald R. Bernard  
SDN Users Association, Inc.  
P. O. Box 4014  
Bridgewater, NJ 08807

Clifton Craig, Jr.  
South Carolina Public  
Communications Association  
1132 S. Center Road  
Darlington, SC 29532

John F. Beach, P.A.  
1400 Main St., Suite 1207  
Post Office Box 444  
Columbia, SC 29202-0444  
Counsel for South Carolina Public  
Communications Association

Robert M. Lynch  
Durward D. Dupre  
Mary W. Marks  
J. Paul Walters, Jr.  
Southwestern Bell Telephone Company  
One Bell Center, Room 3536

St. Louis, MO 63101  
Leon M. Kestenbaum  
Jay C. Keithley  
H. Richard Juhnke  
Sprint Corporation  
1850 M St., NW, 11th Floor  
Washington, D.C. 20036

Charles C. Hunter  
Hunter & Mow, P.C.  
1620 I St., NW, Suite 701  
Washington, D.C. 20006  
Attorneys for Telecommunications  
Resellers Association

Teresa Marrero  
Judith E. Herman  
Teleport Communications Group Inc.  
Two Teleport Dr., Suite 300  
Staten Island, NY 10301

Pat Wood, III  
Robert W. Gee  
Judy Walsh  
Public Utility Commission of Texas  
7800 Shoal Creek Blvd.  
Austin, TX 78757

Mary McDermott  
Linda Kent  
Charles D. Cosson  
United States Telephone Association  
1401 H St., NW, Suite 600  
Washington, D.C. 20005

Sondra J. Tomlinson  
Daniel L. Poole  
U S WEST, Inc.  
1020 19th St., NW, Suite 700  
Washington, D.C. 20036

George E. Young  
Vermont Public Service Board  
Drawer 20  
Montpelier, VT 05620-2701

Sheldon M. Katz  
Vermont Department of Public Service  
Drawer 20  
Montpelier, VT 05620-2601

Edward C. Addison  
Virginia State Corporation Commission  
1300 East Main St. - 9th Floor  
P. O. Box 1197  
Richmond, VA 23218

Rogert B. Skrypczak  
Wisconsin Public Communications Assn.  
W6246 County Trunk BB, Suite B  
Appleton, WI 54915

E. M. Thurmond  
Yuma International Airport  
2191 E. 32nd Street  
Yuma, AZ 85365